



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

OCT 19 2015

Hylton Jackson
Iowa Department of Natural Resources
502 East 9th Street
Des Moines, Iowa 50319

Re: Vogel Paint & Wax Superfund Site, Maurice, Iowa

Dear Mr. Jackson:

The U.S. Environmental Protection Agency (EPA) has reviewed the letter dated October 5, 2015, from GeoTek to the Iowa Department of Natural Resources (IDNR), which provided GeoTek's responses on behalf of Vogel to the IDNR's and the EPA's comments on the 2015 Semi-Annual Groundwater Monitoring Report. Per our phone conversation on October 6, 2015, the EPA has several concerns regarding the October 5, 2015 letter. In the EPA's correspondence, dated April 4, 2007 and in the 2014 Five Year Review (FYR) Report, the EPA indicated that the groundwater remedy at the site, which was effectively discontinued in December 2004, should be restarted. In the October 5, 2015 letter, GeoTek questioned whether additional groundwater remediation is warranted and suggested that more sampling is necessary to make this determination.

The need for remedial action is established in the 1989 Record of Decision (ROD), modified by the July 1994 and October 2000 Explanation of Significant Difference (ESD) and stated in the 2003 Consent Order between the IDNR and Vogel. In the 2014 FYR, the EPA evaluated the performance of the remedy relative to the requirements established. The 2014 FYR concluded that groundwater migration at the site was not under control and that the groundwater treatment system needed to be restarted. Specifically, the FYR evaluated whether the remedy was performing as intended and concluded that trends showed that phytoremediation and natural attenuation have not been effective at reducing groundwater contaminant concentrations or in meeting the remedial action objectives to prevent off-site migration. Therefore, the groundwater remedy is not currently functioning as intended and the FYR recommended restarting or reconstructing the groundwater treatment system to contain and remediate the plume.

The 2014 Annual Groundwater Monitoring Report prepared by GeoTek further supports the need for remedial action by showing increasing contaminant concentrations in groundwater at wells GMW-7R, GMW-21, GMW-30 and GMW-33. The report recognized the need for additional groundwater remediation and suggested looking into remedial alternatives while evaluating what would be necessary to restart the groundwater treatment system. The report also indicated Vogel and GeoTek were going to evaluate replacing the packed tower in the treatment system with a shallow air stripper tray system. The 2015 Semi-Annual Groundwater Monitoring Report mentioned two injection type alternatives for potential groundwater treatment options. Given this, it would appear that Vogel and GeoTek understood the need for remedial action. The suggestion that additional sampling is needed prior to implementing the required remedial action is not supported by the long history of groundwater monitoring at the site.

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Although the groundwater remediation system may be shut down in winter months due to potential freezing conditions at the site, the Consent Order requires the system to be restarted if remediation goals in groundwater are exceeded at any designated perimeter wells or if the groundwater contaminant levels are increasing. As noted in the FYR, both of these conditions have been met due to the elevated concentrations at well GMW-30 and the increasing trends listed above. The IDNR should take steps to require Vogel to resume operation of the system.

Since the groundwater remediation system is turned off during the winter months and is currently inoperable, it may not be feasible to restart system operations in 2015. Therefore, a plan to restart the system by April 2016, when temperatures at the site will allow for routine operations, should be developed and implemented as soon as possible.

If Vogel feels that a different remedial option would be better suited at the site and the IDNR agrees, then the IDNR should require Vogel to present a plan with a proposed alternative that will meet the remedial objectives for the site outlined in the ROD, ESDs and Consent Order. The plan should explain how the alternative will be implemented, reasons the alternative is better suited for the site, outline performance standards that will measure the alternative effectiveness, establish contingencies for what will happen if the performance standards are not met, and describe a timeline for implementation that shows the alternative can and will be in place by April 2016. An amendment or ESD to the ROD and an amended Consent Order may be necessary depending on the nature of any proposed modifications to the remedy.

The EPA recommends that our agencies further discuss the strategy for moving this site forward in a timely manner. If you have questions concerning this letter, please contact me at (913) 551-7977 or mccoy.erin@epa.gov.

Sincerely,



Erin S. McCoy, P.G.
Remedial Project Manager
Iowa/Nebraska Remedial Branch
Superfund Division

cc: Mr. Scott Heemstra, Vogel
Mr. Keith DeLange, GeoTek